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9 Attorneys for Defendants
10 COUNTY OF SANTA CLARA (Erroneously sued
as Santa Clara County Department of Social
Services), GALE SIMMONS (Erroneously sued as
Gail Simmons), and GUADALUPE ACEVES
11 (Erroneously sued as Guadalupe Acezes)

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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
(San José Division)

ABHIJIT PRASAD,

No. 15-CV-4933 BLF

Plaintiff,

v.

SANTA CLARA COUNTY DEPARTMENT OF
SOCIAL SERVICES, GAIL SIMMONS,
GUADALUPE ACEZES, and DOES 1-20,

Defendants.

**DEFENDANTS' ADMINISTRATIVE
MOTION TO SEAL UNREDACTED
EXHIBIT "O" TO DECLARATION OF
HARRISIN TAYLOR IN SUPPORT OF
DEFENDANTS' MOTION FOR SUMMARY
JUDGMENT, AND EXHIBIT "P" TO
DECLARATION OF JULIE MCKELLAR
IN SUPPORT OF DEFENDANTS' MOTION
FOR SUMMARY JUDGMENT; AND FOR
PERMISSION TO FILE REDACTED
VERSIONS OF BOTH EXHIBITS**

Pursuant to Local Rules 7-11(a) and 79-5(b), Defendants respectfully request that the Court order the Clerk of the Court to file under seal unredacted Exhibit O to the Declaration of Harrison Taylor in Support of Defendants' Motion for Summary Judgment (Taylor Dec.) and Exhibit P to the Declaration of Julie McKellar in Support of Defendants' Motion for Summary Judgment (McKellar Dec.). This request is supported by the accompanying Declaration of Steve Schmid (Schmid Dec.). Pursuant to Local Rule 79-5, a proposed order accompanies this request.

A party must meet a "compelling reasons" standard to obtain a court order sealing documents attached to a summary judgment or other dispositive motion. *Kamakana v. City and County of Honolulu*, 447 F.3d 1172, 1179 (9th Cir. 2006). Compelling reasons exist when records may

1 “become a vehicle for improper purposes.” *Id.*

2 Here, Defendants believe the “compelling reasons” is satisfied. Exhibits O and P consist of
 3 true and correct copies of letters relevant to the case, which include references to the names of minor
 4 children. Thus, Defendants seek permission to seal the unredacted versions of Exhibits O and P and
 5 to file redacted versions – which block out references to the names of minor children.

6 At least one court has determined that victim information pertaining to minor children meets
 7 the “compelling reasons” requirement for sealing. *Grimes v. Ayerdis*, No. 16-CV-06870-WHO,
 8 2018 WL 3730314, at *8, fn. 2 (N.D. Cal. Aug. 6, 2018). Accordingly, Defendants respectfully
 9 request that the Court grant their motion to file the following documents under seal.

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11 Dated: February 1, 2019

Respectfully submitted,

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JAMES R. WILLIAMS
 13 COUNTY COUNSEL

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By: _____ /S/
 STEPHEN H. SCHMID
 Deputy County Counsel

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